0010

C/041/002 Incoming

Canyon Fuel Company, LLC.
Sufco Mine
A Subsidiary of Arch Western Bituminous Group, LLC.

Ken May, General Manager
397 South 800 West
Salina, UT 84654
(435) 286-4400 - Office
(435) 286-4499- Fax

#3272
K

April 26, 2009

Permit Supervisor
Utah Coal Regulatory Program
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P. O. Box 145801
Salt Lake City, Utah 84114-5801

Re: West Fork of Box Canyon Subsidence Crack Monitoring Amendment, Canyon Fuel Company, LLC, SUFCO Mine C/041/002

Dear Permit Supervisor:

The enclosed eight complete clean copies of the West Fork of Box Canyon Subsidence Crack Monitoring Amendment are being submitted for approval to amend the subsidence crack measuring monitoring plan in this area. Subsidence cracks in the area of the West Fork of Box Canyon are located in the Longwall area 10 that has been mined out since 2001, and the area is now assumed to be dormant and there will not be anymore movement in this area. Attached are DOGM forms C-1 and C-2 and appropriate pages.

This new amendment change will not affect any new disturbance to the permitted area or any change in runoff, vegetation, and topsoil.

If you have any questions or need additional information, please contact Mike Davis at (435) 286-4421.

Sincerely,
CANYON FUEL COMPANY, LLC
SUFCO Mine

Kenneth E. May
General Manager

Encl.

KEM/MLD:kb

cc: DOGM Price Field Office
DOGM Correspondence File

sufpub\govt2009\dogmmrp\MRP Box Canyon Crack Monitoring ltr.doc

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DIV. OF OIL, GAS & MINING

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change ☒ New Permit ☐ Renewal ☐ Exploration ☐ Bond Release ☐ Transfer ☐

Permittee: CANYON FUEL COMPANY, LLC
Mine: SUFCO MINE **Permit Number:** C/041/002
Title: West Fork of Box Canyon crack monitoring amendment.
Description, Include reason for application and timing required to implement:
Area has been mined out since 2001, and the area is now assumed to be dormant.

Instructions: If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

☐ Yes ☒ No 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: _____ ☐ increase ☐ decrease.
☐ Yes ☒ No 2. Is the application submitted as a result of a Division Order? DO# _____
☐ Yes ☒ No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
☐ Yes ☒ No 4. Does the application include operations in hydrologic basins other than as currently approved?
☐ Yes ☒ No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
☐ Yes ☒ No 6. Does the application require or include public notice publication?
☐ Yes ☒ No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
☐ Yes ☒ No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
☐ Yes ☒ No 9. Is the application submitted as a result of a Violation? NOV # _____
☐ Yes ☒ No 10. Is the application submitted as a result of other laws or regulations or policies?
Explain: _____
☐ Yes ☒ No 11. Does the application affect the surface landowner or change the post mining land use?
☐ Yes ☒ No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
☐ Yes ☒ No 13. Does the application require or include collection and reporting of any baseline information?
☐ Yes ☒ No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
☐ Yes ☒ No 15. Does the application require or include soil removal, storage or placement?
☐ Yes ☒ No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
☐ Yes ☒ No 17. Does the application require or include construction, modification, or removal of surface facilities?
☐ Yes ☒ No 18. Does the application require or include water monitoring, sediment or drainage control measures?
☐ Yes ☒ No 19. Does the application require or include certified designs, maps or calculation?
☒ Yes ☐ No 20. Does the application require or include subsidence control or monitoring?
☐ Yes ☒ No 21. Have reclamation costs for bonding been provided?
☐ Yes ☒ No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
☐ Yes ☒ No 23. Does the application affect permits issued by other agencies or permits issued to other entities?

Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

KENNETH E. MAY, MINE MANAGER — Kenneth E May — 4/27/09
Print Name — Sign Name, Position, Date

Subscribed and sworn to before me this 27th day of April, 2009
Jill White
Notary Public
My commission Expires: 3/26, 2012
Attest: State of Utah } ss:
County of Sevier

NOTARY PUBLIC
JILL WHITE
70 W 200 S
Salina, UT 84654
My Commission Expires
March 26, 2012
STATE OF UTAH

For Office Use Only:	Assigned Tracking Number:	Received by Oil, Gas & Mining
		RECEIVED APR 29 2009 DIV. OF OIL, GAS & MINING

Form DOGM- C1 (Revised March 12, 2002)

APPLICATION FOR COAL PERMIT PROCESSING
Detailed Schedule Of Changes to the Mining And Reclamation Plan

Permittee: CANYON FUEL COMPANY, LLC
Mine: SUFCO MINE **Permit Number:** C/041/022
Title: West Fork of Box Canyon crack monitoring amendment.

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

			DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED
☐ Add	☒ Replace	☐ Remove	Pages 5-39, 5-39A, 5-39B, 5-39C, 5-39D and 5-40 in Chapter 5, Volume 1 of MRP.
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Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.	**Received by Oil, Gas & Mining**

Form DOGM - C2 (Revised March 12, 2002)

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mine where similar geomorphologic and geologic conditions occur. This program was developed and implemented by the Fall of 2000. Subsidence cracks in the area of the West Fork of Box Canyon were surveyed for their location. However, in the years 2000 through 2003 the width and/or offset of the cracks were not measured or the records were not kept. Width and/or offset measurements were made in the Fall of 2004 and will again be made in the Fall of 2005 and every year thereafter. It is believed by the permittee that any change in the width of the cracks can easily be tracked on an annual basis rather than a semi-annual basis. The permittee has observed that most subsidence cracks that develop in the mining area do not change significantly after the first 4 to 6 months following their creation. The crack measurement records will be reported in the mines annual report. Subsidence cracks in the area of the West Fork of Box Canyon are located in Longwall area 10 that has been mined out since 2001, and the area is now assumed to be dormant. 2008 will be the last year these cracks will be monitored since there will not be anymore movement in this area.

Anticipated Effects of Subsidence. Future subsidence in the permit area is anticipated to be similar to that which has occurred in the past. Subsidence is expected to average about 4 feet above longwall panels, with a draw angle of about 15 degrees. Tension cracks are expected to occur in areas of subsidence with these cracks healing to some degree following formation. Tension cracks are anticipated to be less pronounced above longwall workings than above continuous-miner workings.

Previous surveys have indicated that no substantial damage has occurred to vegetation as a result of subsidence within the permit area. The only effects observed have been exposed plant roots where tension cracks have formed.

It is anticipated that subsiding under portions of East Fork Box Canyon will result in a slight flattening of the stream gradient, which will increase pooling of the stream through a stretch of several hundred feet of the stream. Cracks will also likely develop across the East Fork Box Canyon Creek directly above the longwall panels and along the gate roads. These crack zones will form shortly after undermining of the stream bed. They are anticipated to be 1 to 2 inches or

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less in width with these cracks healing to some degree following formation. Details of the expected location of the cracks are given in Appendix 7-19. If cracks do develop in the channel floor and appear to be taking surface water from the creek, sealing of these cracks will be done with bentonite grout. Use of bentonite grout for the sealing of the cracks in the channel floor is discussed in Section 3 of the Pines Tract FEIS (1999) and in more detail in the following section.

East Fork of Box Canyon Subsidence Monitoring and Mitigation

Portions of the East Fork of Box Canyon will be undermined and subsided as longwall panels 3LPE and 4LPE are extracted in 2003 through 2005. A monitoring plan that is more intensive than the general permit area has been proposed for monitoring vegetation, surface and ground water flows, and subsidence cracks and repair of the cracks in the portions of the East Fork to be undermined. The subsidence portion of the monitoring program is discussed in detail in the following text.

Prior to the initiation of undermining and subsidence, a presubsidence survey will be conducted in the East Fork of Box Canyon from the Joe's Mill Ponds downstream to a location above the west gate roads associated with the 3LPE panel. The survey will consist of video taping the condition of the stream channel paying particular note to surface flows and ground water discharge, vegetation types and conditions, animal life in the area including macroinvertabrates in the stream channel, soil conditions, and the general geomorphology of the area. A follow-up video survey will be made at the same time of year on the third year following undermining during September of 2008. A general comparison between the two tapes will be made to determine what, if any, effects to the parameters described above have occurred. The biological aspects of the video tape are discussed in greater detail in Section 3.2.2.2 while the monitoring of surface and ground water flows are discussed in Section 7.3.1.2.

The subsidence monitoring plan for the East Fork of Box Canyon will include frequent inspection of the stream channel during and after active subsidence. While mining is occurring under the stream channel and within the 15-degree angle-of-draw above the active longwall face, that area of the channel will be inspected twice a week for subsidence cracks or other related features. As the longwall face advances and the 15-degree angle-of-draw area follows, the portions of the

channel that now lie outside the 15-degree angle-of-draw will be monitored for subsidence features on an every two week basis for eight weeks. Following the eight week period, the features will be monitored on a quarterly basis for two years following the cessation of subsidence related effects, if any, due to mining. Table 7-5A in Chapter 7 lists the schedule for water and subsidence monitoring frequency.

Mitigation of cracks that would appear to interrupt or divert flows from the stream channel will be sealed immediately with bentonite. Sufco will use hand placement methods when sealing cracks with bentonite. The individual(s) conducting the survey will be equipped with an adequate volume of bentonite, in powder, granular, and/or chip form, to seal small cracks. The bentonite may be placed by pouring it directly into the crack and hydrating with stream water or, if in an actively flowing portion of the stream, temporarily diverting the flow around successive portions of the crack using native soils and placing the bentonite in the exposed section of the crack until the crack is sealed. Sealing of the lower portions of the channel walls may also be required if the crack occurs where the channel is defined by bedrock. If cracks are present in channel walls defined by soil, the soil cracks will be hand filled using a native soil/bentonite mix. The sealing of the channel floor and walls will be accomplished with hand tools such as shovel, picks, trowels, etc. In the unlikely event that cracks too large to be sealed through the efforts of one or two persons in one day do occur and it appears there is a danger of water being diverted from the channel for an extended period of time, arrangements will be made to get additional help to the site as soon as possible.

Sufco will conduct longwall mining operations in such a manner as to minimize surface disturbance while mining within the 15-degree angle-of-draw area that includes the East Fork stream channel. This will be accomplished by advancing the longwall on a schedule where mining will not be suspended for a period to exceed 48 hours. This mining schedule has been discussed with the BLM. A similar mining schedule was successfully implemented at the Canyon Fuel Company Skyline Mine while the lower sections of Burnout Canyon were undermined. No damage to the stream channel or reduction in stream flows were noted as a result of undermining that portion of Burnout Canyon using the approved mining schedule.

A weekly report will be submitted via e-mail to the Division detailing the results of the inspections. The reports will include, but not necessarily be limited to: a map illustrating the current location of the longwall face; descriptions and dates of field activities; noted changes in stream and local geomorpholgy; location, width, frequency of cracks; and a description of repairs, if any, conducted. If the prescribed inspections cannot be conducted, the reason for the missed inspection and a record of the attempt to conduct the inspection will be submitted to the Division in the weekly report. The Division will be notified immediately after mining-induced cracks, if any, are found in the East Fork stream channel and the steps taken or planned to be taken as mitigation. Thereafter, the Division will be advised of continuing mitigation efforts, if needed, in the weekly report.

A copy of the October 2003 "Monitoring and Mitigation Plan for Mining Under the East Fork of Box Canyon" prepared by the Division and reviewed and accepted by the Forest with some modifications has been included in Appendix 3-10. The preceding paragraphs have been prepared based on this plan. Sufco will meet all of the monitoring and mitigation responsibilities described in the plan as it pertains to the undermining of the East Fork of Box Canyon.

Though not anticipated, short segments of Cowboy Creek could be subsided in the SITLA Muddy Tract. If this is anticipated to occur, Sufco, will submit a plan for mitigation to address, if it occurs, adverse impacts to Cowboy Creek. With the approval of the Division and concurrence of the Forest, Sufco will instigate a flow monitoring plan similar to the plan implemented prior to the undermining of the East Fork of Box Canyon. If mitigation of surface cracks are required, methods similar to those proposed and implemented in the East Fork of Box Canyon as described above could be used.

Mining within the area of the East Fork of the Box Canyon and within the area of Cowboy Canyon in the SITLA Muddy Tract will be conducted in accordance with State and Federal rules and regulations and the requirements and stipulations presented in the BLM's Conditions of Approval of the Resource Recovery and Protection Plan (July 31, 2003) located in Appendix 1-2. A survey of the water quality and quantity of surface and groundwater, including State appropriated waters, within the SITLA Muddy Tract has been completed. The results of the area survey are included

in the PHC for the SITLA Muddy Tract and included in Appendix 7-20. Ground and surface waters in the tract that have attached rights are listed in Appendix 7-1.

A discussion regarding the methods Sufco would employ to mitigate and replace an adversely affected State appropriated water supply is provided in Chapter 7, Section 7.3.1.8.

5.2.5.2 Subsidence Control

Adopted Control Measures. As indicated above, SUFCO Mine has adopted subsidence-control measures in areas where surface resources are to remain protected. These controls consist primarily of leaving support pillars in place in those areas designated on Plates 5-10A & 5-10B as not planned for subsidence. Based on experience and data collected from the permit area, the design of support pillars for those areas where subsidence is not planned has been based on the following equations:

$$SF = SD/OS \quad (5\text{-}1)$$

where SF = safety factor against pillar failure (fraction)

SD = support strength density (psi)
= $(Y_c)(1\text{-}ER)$

Y_c = average compressive yield strength of the coal (psi)
= 3090 psi for the Upper Hiawatha seam

ER = extraction ratio (fraction)
= $1\text{-}(A_p/A_t)$

A_p = pillar area (ft^2)

A_t = area supported by pillar (ft^2)

OS = overburden stress (psi)
= $(d)(D_o)/144$

d = overburden depth (ft)

D_o = overburden density (lb/ft^3)
= 160 lb/ft^3 for the permit area

Based on these equations and data, the support pillar designs summarized in Table 5-3 have been derived. This equation does not take into account either size effect or shape effects and is based on a one-dimensional stress field. Historically this equation has provided good results when used in areas where a number of uniform pillars are extracted. One area (5 North panels) of the mine experienced pillar failure when the area was flooded with water after mining of the panels had been completed. This particular area was mined using a double pass technique and the mining height was from 14 to 18 feet. The resulting pillars varied from 25 feet x 25 feet to 40 feet x 40 feet. The underlying floor was a weak mudstone that lost its cohesive strength when wet. When the 1R5N and 2R5N panels were flooded the underlying mudstone became saturated and lost its cohesive strength. This allowed the pillars in the area with SF < 2.5 to fail, because frictional confinement on the bottom of the pillar was lost. To prevent reoccurrence the Applicant will commit to not flood areas of the mine that have small pillars and a weak mudstone floor in areas where subsidence is to be prevented.

Compliance With Control Plan. SUFCO Mine will comply with all provisions of the approved subsidence control plan.

Correction of Material Damage. No material damage of surface resources is anticipated as a result of subsidence in the permit area. However, should material damage occur, SUFCO Mine will correct any material damage resulting from subsidence caused to surface lands to the extent technologically and economically feasible by restoring the land to a condition capable